

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com
Attorneys for Defendants
7 *Las Vegas Metropolitan Police Department,*
Vanessa Mitchell, and Don'te Mitchell

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MARY SMITH, individually, and as Special
11 Administrator of the Estate of JAMES PEREA,
Plaintiffs,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; WELLPATH, LLC; RN
14 RACHEL CLARK; RN TANJA
WASIELEWSKI; RN GENEVA BESSIE;
15 LCSW SANDRA CELIS; MA/LNA MELEKA
ST. JOHN. RN STEPHANIE ESTALA; NP
16 HUGH ANDREW ROSSET; NP SHELLEY
AMEDURI; PA ANDREA BALOGH; RN
17 AYNUR KABOTA; CORRECTIONS
OFFICER VENESSA MITCHELL:
18 CORRECTIONS OFFICER DON'TE
MITCHELL; CORRECTIONS OFFICER
19 JOSHUA WALDMAN; DOES 1-30,
Defendants.

Case No.: 2:23-cv-00092-JAD-NJK

**STIPULATION TO EXTEND BRIEFING
DEADLINE REGARDING PLAINTIFFS'
MOTION FOR SANCTIONS AGAINST
LVMPD
[ECF No. 105]**

20
21 IT IS HEREBY STIPULATED AND AGREED between the parties that the briefing
22 deadlines for Plaintiffs' Motion for Sanctions Against LVMPD, (ECF No. 105), be extended by
23 seven days. The current deadline for Defendants to file a Response to Plaintiffs' Motion is
24 September 6, 2024; and Plaintiffs' Reply is due September 13, 2024. The parties stipulate and

1 agree to extend these deadlines so that **Defendants' Response is due September 13, 2024**, and
2 **Plaintiffs' Reply is due September 20, 2024**.

3 The parties request this extension based on Plaintiffs' recent filing of an Errata to the
4 Motion, (ECF No. 111), and Counsel for Defendants will be out of the Office on September 6,
5 2024. Accordingly, the parties request additional time to complete briefing on this Motion.

6 DATED this 4th day of September, 2024.

DATED this 4th day of September, 2024.

7 By: /s/ Lyssa S. Anderson
Lyssa S. Anderson (SBN 5781)
8 Kristopher J. Kalkowski (SBN14892)
1980 Festival Plaza Drive, Suite 650
9 Las Vegas, Nevada 89135
Attorneys for Defendants,
10 *Las Vegas Metropolitan*
Department, Vanessa Mitchell, and
11 *Don'te Mitchell*

By: /s/ Peter Goldstein
Peter Goldstein (SBN 6992)
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Attorney for Plaintiffs
Mary Smith, individually, and as
Special Administrator of the Estate of
James Perea

12 DATED this 4th day of September, 2024.

13 /s/ Robert D. Rourke
S. Brent Vogel (SBN 6858)
14 Robert D. Rourke (SBN 5757)
6385 S. Rainbow Blvd, Suite 600
15 Las Vegas, NV 89118
Attorneys for Defendants
16 *Wellpath, LLC; Rachel Clark, RN;*
Geneva Bessie, RN; Stephanie
17 *Estala, RN; Andrea Balogh, NP;*
Hugh Andrew Rosset, NP; Tanja
18 *Wasielewski, RN; Shelley Ameduri,*
PA; Meleka St. John, RN; and
19 *Sandra Celis, LCSW.*

20 **IT IS SO ORDERED.**

21 DATED this 5th day of September, 2024.



22
23 Nancy J. Koppe
24 UNITED STATES MAGISTRATE JUDGE